

### REMARKS/ARGUMENTS

Claims 1-32 are pending in this application. Claims 1, 14 and 21 are independent claims.

#### Claim Rejections – 35 USC § 103(a)

Claims 1-32 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Colbrook et al. (“Colbrook”, Algorithms For Search Trees On Message Passing-Architectures) in view of Dixon et al. (“Dixon”, U.S. Patent No. 4,464,718) and IBM Technical Bulletin entitled *Parallel Table Directed Translation* (“IBM”). Applicants respectfully traverse this rejection.

“To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (emphasis added) (MPEP § 2143). If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. (emphasis added) *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

Independent Claim 1 recites an element of “at least one search engine” (emphasis added). In rejecting Claim 1, the Patent Office first admitted that Colbrook “do not show a search engine” (Office Action, page 3, line 7 from bottom). Then, the Patent Office went on to allege that Dixon “teaches a search engine [note: search engine (controller 16) figure 1; abstract]” (Office Action, page 3, lines 5-6 from bottom). Applicants respectfully disagree.

Col. 4, lines 30-40 of Dixon recites:

The host CPU 10 is connected via a bus 14 to an I/O controller 16. The functions of the I/O controller 16 include receiving data scan requests from the host CPU 10 (in the form of search request blocks as shown in FIG. 2), assembling the data necessary for performing the record scanning operation, and relaying the information necessary for performing the record scanning operation to the record

scan circuit 20 and a device control unit 21 which is connected via bus 22 to a number of disk files 24A-24D (emphasis added).

In other words, “controller 16” in figure 1 of Dixon is an *I/O* controller and thus *cannot* be a search engine as recited in Claim 1. For the convenience of the Patent Office, the search engine is illustrated, for example, in FIG. 2 and paragraph [0025] at page 8 of Specification of the present application.

Since Colbrook, Dixon and IBM fail to teach, disclose, or suggest an element of “at least one search engine,” as recited in Claim 1, it is respectfully submitted that a *prima facie* case of obviousness has not being established for Claim 1. Therefore, the rejection should be withdrawn, and Claim 1 is allowable.

Moreover, Claim 3 recites an element of “wherein the at least one search engine includes a priority controller, memory, edit module, search module and address cache” (emphasis added). In rejecting Claim 3, the Patent Office has alleged that such element was taught by FIGS. 1-7 of Colbrook, and FIG. 1 and col. 4, lines 32-68 of Dixon. Applicants respectfully disagree. It is respectfully submitted that nowhere in the places pointed out by the Patent Office was “a priority controller” taught, disclosed, or suggested. Applicants herein respectfully request the Patent Office to pinpoint *exactly* where in Colbrook and Dixon was the element “a priority controller,” as recited in Claim 3, taught, disclosed, or suggested. At least based on this reason, the rejection should be withdrawn, and Claim 3 is allowable.

Claims 2-13 and 4-13 depend from Claims 1 and 3, respectively, and are therefore allowable due to their dependence.

Claims 21-32 were rejected based essentially on the same rationales as applied to Claims 1-13 and are therefore allowable since Claims 1-13 are allowable.

Independent Claim 14 recites an element of “a priority controller” (emphasis added). Based on the same rationale as applied to Claim 3 (see above), Claim 14 is allowable since Colbrook, Dixon and IBM fail to teach, disclose or suggest the element “a priority controller,” as recited in Claim 14.

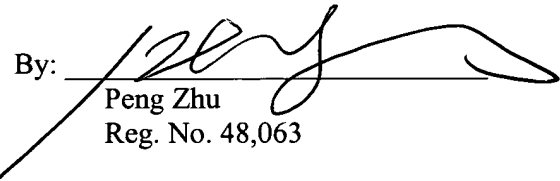
Claims 15-20 depend from Claim 14 and are therefore allowable due to their dependence.

**CONCLUSION**

In light of the foregoing, Applicants respectfully request that a timely Notice of Allowance be issued in the case.

Respectfully submitted on behalf of  
LSI Logic Corporation,

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By:   
Peng Zhu  
Reg. No. 48,063

SUITER • WEST PC LLO  
14301 FNB Parkway, Suite 220  
Omaha, NE 68154  
(402) 496-0300      telephone  
(402) 496-0333      facsimile